

UNITED STATES OF AMERICA,
Plaintiff,
vs.
IAN FURMINGER,
Defendant.

STIPULATION RE SURRENDER
DATE

1. Defendant Furminger's motion for bail pending appeal was denied by the Court of Appeals on April 15, 2015. His surrender date previously had been stayed automatically by the filing of his motion with the Court of Appeals.
2. The Court must reset Mr. Furminger's surrender date now that his bail motion has been denied.
3. Mr. Furminger should be permitted to surrender to serve his sentence on or before April 30, 2015 for the following reasons. The Bureau of Prisons designated Mr. Furminger to serve his sentence at a camp in Florence, Colorado. Brian Getz, Mr. Furminger's trial counsel,

1 intends to fly with Mr. Furminger to Denver, and then drive him to Florence, which is 108 miles
2 away. Mr. Getz will pay for the costs himself. Mr. Getz believes that his accompanying Mr.
3 Furminger to the camp will ensure that the surrender goes smoothly and also that surrendering
4 Mr. Furminger directly to the camp will have a positive impact on his security level.

5 4. Mr. Getz will be on vacation from April 20 to April 27, 2015 and will not be able
6 to take Mr. Furminger to Colorado until after he returns. He will purchase plane tickets today for
7 a flight on April 29, 2015 in order to take advantage of the lesser fares for flights bought two
8 weeks in advance. He then will deliver Mr. Furminger to Florence by 11:00 a.m. on April 30,
9 2015.

10 IT IS SO STIPULATED.

11 DATED: April 15, 2015

12 /s/ Mark Goldrosen
13 MARK GOLDROSEN
Attorney for Defendant IAN FURMINGER

14 DATED: April 15, 2015

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17 /s/ John Hemann
JOHN HEMANN
Assistant United States Attorney
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